

REMARKS

Claims 1-78 and 162-174 are pending in the present application, with claims 1, 2, 27, 48, 64, 78, 162, 163, 164, 165, and 166 being the independent claims. Claims 1, 3, 30, 51, 65 and 170-174 are canceled herewith.

In summary of the outstanding Office Action, claims 1-78 and 162-174 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lau (US 5,987,247) in view of Lindhorst et al. (US 6,337,696) in further view of Quaeler-Bock et al. (US 6,023,271).

Reconsideration of the outstanding rejections to the claims is respectfully requested in view of the following remarks and amendments.

Claim rejections under 35 U.S.C. §103

Claims 1-78 and 162-174 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lau (US 5,987,247) in view of Lindhorst et al. (US 6,337,696) in further view of Quaeler-Bock et al. (US 6,023,271). Claim 1, 3, 30, 51, 65 and 170-174 are canceled herewith, thus withdrawal of the rejections of claims 1, 3, 30, 51, 65 and 170-174 is earnestly solicited.

Claim 2 as amended herein includes the limitations of canceled claim 3. Corresponding amendments have been made to independent claims 27, 48, 64, 78 and 162-166. With respect to the added limitations of canceled claim 3, the Office Action contends that Lindhorst et al. (Lindhorst) discloses the limitation regarding the specifics of generating the event handler skeleton. However, the Office Action does not indicate there is any motivation to combine Lindhorst with Lau with respect to how the generation of the event handler skeleton is performed. According to MPEP 2143, "To establish a prima facie case of obviousness... first, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." Thus, a prima facie case of obviousness has not been made because the Office Action did not indicate that there is any

motivation to implement the system of Lau with the generation of an event handler skeleton according to the particular way described by Lindhorst.

Furthermore, even if there was a motivation to combine Lau and Lindhorst with respect to how the generation of an event handler skeleton is accomplished, Lindhorst does not describe all the limitations of claim 2 as amended regarding the generation of the event handler skeleton. In particular, Lindhorst describes parsing an input file (Col. 11, lines 41-44) and searching through the parsed document to send the separated object text, script text and HTML text from the parsed document into separate memory storage (col. 12, lines 61-64). However, Lindhorst does not describe “determining an event handler method based on the tag type, the attribute name and the attribute value.” In Lindhorst the user links an event to a property using the graphical user interface described in Lindhorst. This linking determination is not based on a tag type, attribute name or attribute value of an object. In fact, Lindhorst describes “when linking an event to a property, the user is attempting to use the event’s trigger to change a property of the object.” Applicants submit that changing a property of an object is different than determining an event handler method “based upon” a tag or any attribute (i.e., property) of the object.

Since a prima facie case of obviousness has not been made and all the limitations of claim 2 are not taught or suggested by the individual references cited in the rejections by the Office Action, or any combination thereof, for at least the reasons presented above, withdrawal of the rejection of claim 2 is earnestly solicited.

Claims 4-29, 31-50, 52-64, 66-78 and 162-169 either depend directly or indirectly from claim 2 or were rejected under the same rationale. Thus, Applicants submit that a prima facie case of obviousness has not been made for these claims and all the limitations of these claims as amended are not taught or suggested by the individual references cited in the rejections by the Office Action, or any combination thereof, for at least the same reasons presented above. Therefore, Applicants submit that claims 4-29, 31-50, 52-64, 66-78 and 162-169 of the application are in condition for allowance and withdrawal of the rejections is earnestly solicited.

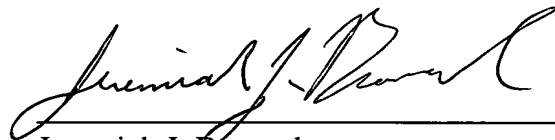
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CONCLUSION

Applicants believe that the present reply is responsive to each point raised by the Examiner in the Office Action and Applicants submit that claims 2, 4-29, 31-50, 52-64, 66-78 and 162-169 of the application are in condition for allowance. Favorable consideration and passage to issue of the application at the Examiner's earliest convenience is earnestly solicited. However, should the Examiner find the claims as presented herein to not be allowable for any reason, Applicants' undersigned representative earnestly requests a telephone conference at (206) 332-1392 with both the Examiner and the Examiner's Supervisor to discuss the basis for the Examiner's continued rejection in light of the Applicant's arguments presented herein. Likewise, should the Examiner have any questions, comments, or suggestions that would expedite the prosecution of the present case to allowance, Applicants' undersigned representative would very much appreciate a telephone conference to discuss these issues.

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